

EXHIBIT 16

Page 3

Page 4

TONI HORTON - 2/6/2020

Page 5	Page 7
<p>1 do that. I'm missing one thing.</p> <p>2 How long have you been an employee</p> <p>3 of Siemens?</p> <p>4 A. I've been employed with Dresser-Rand</p> <p>5 since 2009. Siemens acquired us in 2015. So you</p> <p>6 could say ten years total.</p> <p>7 Q. And what position did you encumber [sic]</p> <p>8 when you first started working for Siemens?</p> <p>9 A. Recruiter. Or Dresser-Rand as a</p> <p>10 recruiter in 2009. So when Siemens took us over in</p> <p>11 2015, I was in human resources, a generalist --</p> <p>12 Q. Generalist.</p> <p>13 A. -- is what the title was back then.</p> <p>14 Uh-huh.</p> <p>15 Q. Did your title ever change since that</p> <p>16 time?</p> <p>17 A. Yes.</p> <p>18 Q. When did it change?</p> <p>19 A. I don't know when. But we were acquired</p> <p>20 in 2015 and so we were integrated into the Siemens</p> <p>21 HR structure. So it was changed to human resource</p> <p>22 consultant. Then it was changed again to HR</p> <p>23 business consultant. My duties have never changed.</p> <p>24 Q. Okay. HR consultant, then HR business</p> <p>25 consultant --</p>	<p>1 A. I don't know. Sorry.</p> <p>2 Q. Somewhere less than 20. Of all --</p> <p>3 whatever number it is, of those claims that you've</p> <p>4 investigated, how many times have you made a</p> <p>5 founding -- finding that the client was actually</p> <p>6 discriminated against?</p> <p>7 A. None.</p> <p>8 Q. And of those 20 investigations,</p> <p>9 approximately how many of them were discrimination</p> <p>10 complaints?</p> <p>11 A. I would say -- I'm trying to think. I</p> <p>12 don't know the exact number. One. One I do recall</p> <p>13 for sure.</p> <p>14 Q. Is that one other than Harriet Lane's</p> <p>15 complaints?</p> <p>16 A. Yes, that's correct.</p> <p>17 Q. What's the name of that individual?</p> <p>18 MS. GRANT: And I'll just put on the</p> <p>19 record this will fall under the terms of the</p> <p>20 protective order.</p> <p>21 MR. BAIL: Absolutely.</p> <p>22 MS. GRANT: It's information related</p> <p>23 to another individual.</p> <p>24 MR. BAIL: Sure.</p> <p>25 Q. (By Mr. Bail) You know what? To make</p>
Page 6	Page 8
<p>1 A. Business partner, yeah. And it's going</p> <p>2 to change again.</p> <p>3 Q. Okay. Really makes it hard here. So HR</p> <p>4 business consultant, you did all the same duties.</p> <p>5 A. Yes.</p> <p>6 Q. Nothing changed.</p> <p>7 A. Yes, same duties.</p> <p>8 Q. Okay. As an HR business consultant or</p> <p>9 an HR consultant, do you conduct interviews of</p> <p>10 claims of discrimination by employees of Siemens?</p> <p>11 A. I conduct any claim that an employee</p> <p>12 makes --</p> <p>13 Q. Okay.</p> <p>14 A. -- for any reason.</p> <p>15 Q. All right. Approximately how many</p> <p>16 investigations have you done since 2015?</p> <p>17 A. I don't remember, to tell you the truth.</p> <p>18 Q. More than 50, less than 50?</p> <p>19 A. No. Less than 50 for sure.</p> <p>20 Q. Less than 30, more than 30?</p> <p>21 A. Less than 30 for sure.</p> <p>22 Q. More than 20, less than 20?</p> <p>23 A. Less than 20.</p> <p>24 Q. Okay. Now is where it's probably going</p> <p>25 to get difficult. More than 10 or less than 10?</p>	<p>1 it even easier, was that individual an African</p> <p>2 American female?</p> <p>3 A. No.</p> <p>4 Q. Then I don't need to know. Okay. Cool.</p> <p>5 MS. GRANT: I thought it would be</p> <p>6 easier on the record than me writing you a letter.</p> <p>7 MR. BAIL: Yeah. No. Absolutely.</p> <p>8 Let's just clean it up here.</p> <p>9 Q. (By Mr. Bail) What does PIP stand for</p> <p>10 in the HR field?</p> <p>11 A. Performance improvement plan.</p> <p>12 Q. How many individuals -- strike that.</p> <p>13 How many employees at Siemens have</p> <p>14 you worked on PIPs with?</p> <p>15 A. Quite a few. I don't have an exact</p> <p>16 number. I mean. It's a part of my job.</p> <p>17 Q. Okay. More than 50, less than 50?</p> <p>18 A. Maybe less than 50.</p> <p>19 Q. More than 40, less than 40?</p> <p>20 A. Maybe less than 40. I'm guessing.</p> <p>21 I've, you know, been in the HR role since 2015. And</p> <p>22 a plan is when a manager has an issue with the</p> <p>23 person's performance, so...</p> <p>24 Q. More than 20 for sure. Right?</p> <p>25 A. I can't say for sure.</p>

2 (Pages 5 to 8)

TONI HORTON - 2/6/2020

Page 9	Page 11
<p>1 Q. Okay.</p> <p>2 A. I don't know the exact number.</p> <p>3 Q. It's true that you were involved in some</p> <p>4 manner with a PIP regarding Harriet Lane. Correct?</p> <p>5 A. The removal. Correct.</p> <p>6 Q. The removal.</p> <p>7 A. The removal.</p> <p>8 Q. Strike that. Yeah. The removal. Let's</p> <p>9 go back to PIPs, though. Of all the PIPs that</p> <p>10 you've been involved with, has an employee ever</p> <p>11 passed it?</p> <p>12 A. Yes. Yes.</p> <p>13 Q. Okay. And how do you know Harriet Lane?</p> <p>14 A. Because I started supporting the Siemens</p> <p>15 site in June of 2017. And she's an employee at that</p> <p>16 site.</p> <p>17 Q. And what complaints of -- strike that.</p> <p>18 Did she ever make a complaint of</p> <p>19 discrimination to you?</p> <p>20 A. She's made complaints and I've had to</p> <p>21 investigate each cause.</p> <p>22 Q. Okay. Did she complain of gender and</p> <p>23 race discrimination?</p> <p>24 A. No.</p> <p>25 Q. What did she complain about?</p>	<p>1 Q. (By Mr. Bail) Other than that, any</p> <p>2 other involvement of Bill Piatt with Harriet Lane --</p> <p>3 A. No.</p> <p>4 Q. -- that you're aware of?</p> <p>5 A. No.</p> <p>6 Q. Did Harriet identify any potential</p> <p>7 witnesses for you to interview?</p> <p>8 A. Yes, she did. I do believe it is</p> <p>9 documented in my -- my interviews that I -- the</p> <p>10 claims that I did.</p> <p>11 Q. Your notes?</p> <p>12 A. Yes.</p> <p>13 Q. I don't have that in front of me right</p> <p>14 now, but do you recall if Melissa Shovelski was one</p> <p>15 of those individuals?</p> <p>16 A. I do not recall.</p> <p>17 Q. Do you recall any of the names of the</p> <p>18 individuals?</p> <p>19 A. I believe Amy Barr may have been one.</p> <p>20 Q. Anybody else?</p> <p>21 A. I don't recall any others.</p> <p>22 Q. But if there are, they should be in your</p> <p>23 notes.</p> <p>24 A. Yes.</p> <p>25 Q. Okay. And you said you had no</p>
Page 10	Page 12
<p>1 A. It was bullying. That's what she was --</p> <p>2 bullying and harassing is the term she used quite</p> <p>3 often.</p> <p>4 Q. And were one of the individuals that she</p> <p>5 was concerned about was Bill Piatt?</p> <p>6 A. Yes.</p> <p>7 Q. How do you know Bill?</p> <p>8 A. He's a manager at the site that I</p> <p>9 support.</p> <p>10 Q. And what was your nature of working with</p> <p>11 Bill in regards to Harriet Lane's employment?</p> <p>12 A. So as an HR rep at the site, I support</p> <p>13 their managers in any of their concerns. Or if</p> <p>14 they're -- you know, have questions about policies.</p> <p>15 So there's nothing in relation to Harriet because</p> <p>16 she did not report to him. So I'm not sure I'm</p> <p>17 understanding your question exactly.</p> <p>18 Q. Well, did you -- did you talk to him</p> <p>19 about anything regarding Harriet?</p> <p>20 MS. GRANT: Objection; form.</p> <p>21 You can answer.</p> <p>22 A. Essentially, about her claim. I had to</p> <p>23 investigate her claim against him for bullying. So</p> <p>24 I did have to ask him questions as related to her</p> <p>25 claims in certain situations.</p>	<p>1 involvement with the performance improvement plan of</p> <p>2 Harriet. Correct?</p> <p>3 A. I wasn't supporting the group at the</p> <p>4 time. No.</p> <p>5 Q. Okay. Have you always worked in the</p> <p>6 Houston office of Siemens?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. So before 2015, you were working</p> <p>9 for -- what was the name of the company?</p> <p>10 A. Dresser-Rand.</p> <p>11 Q. Dresser-Rand?</p> <p>12 A. Yes.</p> <p>13 Q. And have you supervised any individuals</p> <p>14 in your capacity as an HR employee?</p> <p>15 A. Not as a -- well, as a recruiter, I was</p> <p>16 a staffing manager, so I did have recruiters that</p> <p>17 reported to me.</p> <p>18 Q. Okay. But not since you were an HR</p> <p>19 business consultant.</p> <p>20 A. Not since we moved over to this new</p> <p>21 structure, no.</p> <p>22 Q. Okay. Do you know who Donna Wilson is?</p> <p>23 A. Yes.</p> <p>24 Q. Who is she?</p> <p>25 A. She's a former employee of Siemens. She</p>

3 (Pages 9 to 12)

TONI HORTON - 2/6/2020

Page 13

1 was a manager at Siemens.
 2 Q. Was she the manager at the time of
 3 Harriet Lane's termination?
 4 A. Yes.
 5 Q. What do you recall -- strike that.
 6 Did you ever have any discussions
 7 with Donna Wilson regarding Harriet?
 8 A. Yes.
 9 Q. Can you please tell the nature of those
 10 discussions?
 11 A. A couple of things. Each time they
 12 would meet, I was aware that they had follow-up
 13 meetings post the PIP removal, or as a part of it to
 14 check in. I believe they did have some -- some kind
 15 of disagreement on a leave request. I don't know
 16 the details of that. But, you know, Donna would
 17 visit with me about their talks. She was, you know,
 18 also concerned with Harriet and some of the
 19 behavior. So just in an HR capacity were our
 20 discussions, basically.
 21 Q. Donna was frustrated -- correct? -- with
 22 Harriet?
 23 A. I believe they may have had an incident
 24 where the FML came into question where -- or I think
 25 something had to do with Harriet's pay. And Harriet

Page 15

1 felt that Donna called her silly because she was
 2 black or because --
 3 A. No, she did not. No.
 4 Q. Okay. But you're aware that she was
 5 claiming that she was being discriminated against.
 6 Correct?
 7 A. At the end, I did. The initial claims
 8 to me, no.
 9 Q. Okay. What do you mean "at the end"?
 10 A. So I believe her last -- I had a meeting
 11 with her to kind of go over all of my findings
 12 because she's made several complaints. And that's
 13 when she made the comment, I feel like I'm being
 14 discriminated against. She didn't say specifically
 15 for what, but she used the term "discriminated
 16 against," I'm being harassed and I'm being bullied.
 17 Q. Did you ask her specifically for what?
 18 A. So -- yes. I mean, give me examples.
 19 Walk me through it. And everything is in my notes.
 20 And you'll find there's no specific basis of what
 21 she said she was targeted for.
 22 Q. Okay. She never told you specifically
 23 gender or race.
 24 A. No.
 25 Q. And you didn't ask.

Page 14

1 had accused Donna -- this is according to Donna --
 2 of causing payroll to have a delay in her pay or
 3 missing pay, so that. But I don't know that overall
 4 she was -- I can't answer that she was --
 5 Q. I have to ask her. Right?
 6 A. Yeah.
 7 Q. Did Donna express to you any concerns
 8 about Harriet complaining about discrimination and
 9 retaliation?
 10 A. No.
 11 Q. Okay. Did you ever interview Donna as
 12 to any claims my client made about --
 13 A. Yes.
 14 Q. -- discrimination?
 15 A. Yes. Well, I made -- I interviewed
 16 Donna based on a claim that Harriet said that Donna
 17 called her out of her name.
 18 Q. Okay.
 19 A. So that's in my notes as well.
 20 Q. When she called her silly or something
 21 like that?
 22 A. Yes. She said "it was silly," that she
 23 did not call her "silly" is what Donna testified to
 24 me about, but yeah.
 25 Q. Okay. But did Harriet tell you that she

Page 16

1 A. That's a part -- yeah. I'm asking you,
 2 what are you being discriminated -- based on what?
 3 Q. Okay.
 4 A. Right. And so she's saying, Well,
 5 they're bullying me. And I can't speak word for
 6 word, but you have my notes.
 7 Q. But you didn't ask her what specific
 8 category she felt she was being discriminated
 9 against, like, race, gender, national origin?
 10 A. I asked an open question. What are you
 11 being discriminated on the basis of? So I'm not
 12 going to feed you, you know, the whole Title 7.
 13 Q. Do you know that she was aware when you
 14 asked the question that that's an open-ended
 15 question, it's not specific towards --
 16 A. I don't know what she knows. I can't
 17 speak to what she understood or not.
 18 Q. Okay. If you can take a look at --
 19 A. Uh-huh.
 20 Q. -- this document and let me know if
 21 you've seen it before.
 22 A. Yes.
 23 Q. And I will --
 24 MR. BAIL: Could you put this
 25 sticker on that?

4 (Pages 13 to 16)

TONI HORTON - 2/6/2020

Page 17	Page 19
<p>1 MS. GRANT: Uh-huh. 2 (Exhibit No. 9 marked.) 3 Q. (By Mr. Bail) Can you identify that 4 document for the record? 5 A. Yes. This is a notification letter that 6 is used when an employee's position is going to be 7 eliminated. 8 Q. Did you prepare this letter? 9 A. No. I don't prepare these letters. 10 Q. Okay. 11 A. These are prepared in Orlando. 12 Q. Ah, okay. Have you ever seen it before? 13 A. Yes. 14 Q. When did you see this? 15 A. When it was sent to me so that I could 16 deliver it to the employee. 17 Q. Okay. Did you make any recommendations 18 in regards to whether Harriet should be terminated 19 or not? 20 A. Did I make any -- no. 21 Q. Okay. 22 A. No. 23 Q. What involvement, if any, did you have 24 in Harriet's termination? 25 A. So as the HR person, I facilitate it.</p>	<p>1 let's... 2 MS. GRANT: Is it 15? 3 MR. BAIL: Yeah. 4 MS. GRANT: That's the one I'm 5 looking at. 6 A. Okay. Just a second. All right. 7 MS. GRANT: Are you looking for 8 Interrogatory 11 and 12. 9 MR. BAIL: Uh-huh. You're so smart. 10 MS. GRANT: I just have a good 11 memory. 12 Q. (By Mr. Bail) All right. If you could 13 take a look at -- are you on Page 15? 14 A. Yes, I'm on Page 15. 15 Q. I know you've never seen this before, 16 but please take a look at Interrogatory No. 11 -- 17 A. Okay. 18 Q. -- and No. 12. 19 A. Okay. 20 Q. And 12 finishes up on the next page. 21 And then when you're finished with that, please let 22 me know. 23 (Document review.) 24 A. I'm finished reading it. 25 Q. (By Mr. Bail) So if you go to Page 15.</p>
Page 18	Page 20
<p>1 So there's a certain process that we go through to 2 validate why a position is being eliminated, there's 3 an approval process that goes through -- up through 4 the VP level. 5 Q. Okay. Can you explain that process? 6 A. Essentially, you have to spell out the 7 cost of what it will take to sever an employee. So 8 you have to get a rule for the cost. You're also 9 working with legal on certain aspects to make sure 10 that it's aligned with company policy and local law. 11 Q. Is that what you did in regards to 12 Harriet? 13 A. Yes. 14 Q. I'm going to show you what's been marked 15 as Exhibit No. 1. 16 A. Okay. 17 Q. Can you please tell me whether you've 18 ever seen this document or something similar to it 19 in this case? 20 A. No. I know what these are, but I've 21 never seen this. 22 Q. Okay. Let's keep that in front of you. 23 A. Okay. 24 Q. Has anybody -- strike that. Has any -- 25 if you could please turn to page -- I think it is --</p>	<p>1 And we're going to talk about Interrogatory No. 11. 2 You see where it says -- under Interrogatory 11, the 3 answer, it says "Donna Wilson and Bill Piatt made 4 the decision to eliminate plaintiff's position and 5 terminate plaintiff's employment." 6 Do you know if that is true or not? 7 A. I do know that they did review it and 8 Donna actually approached me about eliminating the 9 role. 10 Q. Okay. 11 A. So she may have, I can't -- you know, 12 maybe she talked to Bill behind the scenes. 13 Q. Did Bill discuss anything with you in 14 regards to anything you were working on regarding 15 her termination? 16 A. No. Donna is my contact. 17 Q. Okay. Toward the end of that same 18 paragraph, it says "As part of a reduction in force, 19 after they were instructed to reduce the head count 20 of the quality department." 21 Do you see that? 22 A. Yes. 23 Q. Do you know anything about reducing the 24 head count in the quality department? 25 A. No.</p>

5 (Pages 17 to 20)

TONI HORTON - 2/6/2020

Page 21	Page 23
<p>1 Q. If you go to Interrogatory No. 12, do 2 you see where it says "Bill Piatt made the 3 decision" -- "Donna Wilson and Bill Piatt made the 4 decision to eliminate plaintiff's standalone 5 position of lead internal process auditor and 6 terminated plaintiff's employment"? 7 Do you see that? 8 A. Yes. 9 Q. Do you know anything about that? 10 A. Do I -- Donna approached me to eliminate 11 the role. That's what you're asking. Is that what 12 you're asking me? 13 Q. Yeah. Do you know anything about the 14 lead internal process auditor position, that term? 15 A. I don't know what they were calling -- I 16 don't know the specific title of what -- I don't 17 recall what they were calling her. 18 Q. Okay. 19 A. Because that's most likely not the job 20 code in the HR system. 21 Q. Okay. It says here that allegedly they 22 conducted an analysis. Were you a part of that 23 analysis? 24 A. I was not a part of the analysis. They 25 presented me with the -- I believe you may have</p>	<p>1 any -- about Harriet Lane's work duties being 2 reduced in any manner? 3 A. No. 4 Q. Okay. 5 (Exhibit No. 10 marked.) 6 Q. (By Mr. Bail) Can you please identify 7 that document for the record? 8 A. Yes. This is called a delegation of 9 authority. And this is the form that I use to 10 obtain approval from HR, business and legal to move 11 forward with a position elimination. 12 Q. Okay. And is this particular 13 designation of authority dealing with my client, 14 Harriet Lane? 15 A. Yes. 16 Q. Okay. On the top of this document, it 17 says "To Lori Lee, Joyce Triglia Bagwell." 18 A. Triglia. 19 Q. Are they the lawyers? 20 A. No. 21 Q. Who are they? 22 A. They are HR management. So Lori Lee is 23 my manager. Joyce Triglia was the VP of HR at the 24 time. 25 Q. Okay. So why -- what happens after you</p>
Page 22	Page 24
<p>1 copies of that, where they list out the hours needed 2 for the role. 3 Q. Uh-huh. Okay. 4 A. That's the analysis piece that they 5 conducted. Or that's the part I'm aware of. 6 Q. Okay. And that analysis, to your 7 knowledge, was it created by Bill Piatt or Donna 8 Wilson? 9 A. To my knowledge, both may have had a 10 hand in it. I don't know who specifically typed it 11 up -- 12 Q. Okay. 13 A. -- or who provided input to who. 14 Q. Did you use that analysis in any manner 15 in your work product? 16 A. Yes. 17 Q. Can you please explain to the Court how? 18 A. Yes. I used that when working with 19 internal legal on reasons as to why the position 20 needed to be eliminated. 21 Q. Okay. So whatever Bill or Bill and 22 Donna Wilson prepared was used in whatever work you 23 were doing and presenting to legal. 24 A. Yes. 25 Q. All right. Do you have any knowledge of</p>	<p>1 send a document like this to those individuals? 2 A. Everyone has to approve before we can 3 move forward with even this document that you 4 provided to me. So this is the -- the first step in 5 obtaining approval before you even get to 6 conversations with the employee or having it 7 approved at all. 8 Q. Okay. Did you recommend that my client 9 be terminated? 10 A. I agreed with the recommendation. 11 Q. Okay. But you didn't make the 12 recommendation. 13 A. The recommendation comes from the 14 business, not HR. 15 Q. Gotcha. I just want to make sure. 16 Do you know who made the 17 recommendation from business? 18 A. Donna Wilson. 19 Q. Did you talk to Bill Piatt about it as 20 well? 21 A. No. I believe you asked me that before. 22 No. 23 Q. All right. Do you know how -- or do you 24 have any knowledge of any -- of who did my client's 25 duties, work duties after she was terminated?</p>

6 (Pages 21 to 24)

TONI HORTON - 2/6/2020

Page 25

1 A. No.
 2 Q. And this business justification that --
 3 the document we're looking at, Exhibit 10 speaks to,
 4 that business justification comes from management.
 5 A. Donna Wilson.
 6 Q. Yeah.
 7 A. Yes.
 8 Q. Donna Wilson being management.
 9 A. Yes.
 10 Q. Did you ever sit down with Donna Wilson
 11 and Bill Piatt to discuss anything regarding my
 12 client's termination?
 13 A. Donna Wilson only. Bill is not her
 14 manager. It is not -- it's not his business.
 15 Q. Isn't it true that Bill Piatt was
 16 present with Donna Wilson when they were having
 17 follow-up meetings with Harriet Lane?
 18 A. I wasn't present, so I can't -- I have
 19 no --
 20 Q. You weren't present?
 21 A. No.
 22 Q. So you were never present for any
 23 discussions between Donna Wilson, Bill Piatt and my
 24 client.
 25 A. No.

Page 26

1 Q. Never present.
 2 A. No.
 3 Q. Was there any other HR individual that
 4 was working on my client's case specifically at this
 5 time period that you were?
 6 A. No. I'm the only HR supporting that
 7 site from June 2017 to current.
 8 Q. Okay.
 9 MR. BAIL: I'm almost finished, just
 10 going to...
 11 MS. GRANT: Take your time.
 12 Q. (By Mr. Bail) I don't remember if I
 13 asked you this or not. But do you know who Melissa
 14 Shovelski is?
 15 A. I know who she is.
 16 Q. Okay. Did you ever interview her in
 17 regards to any complaints my client made?
 18 A. You did ask. I don't recall ever
 19 interviewing her.
 20 Q. You don't recall. That's right.
 21 A. Yeah.
 22 Q. Would you be surprised to know that
 23 she's testified that she felt Bill Piatt was
 24 discriminating against her because of her gender?
 25 A. Not necessarily.

Page 27

1 Q. You wouldn't be surprised?
 2 A. No, not surprised one way or the other.
 3 Q. Did Bill Piatt make any comments to you
 4 about my client?
 5 A. Yes, we've -- yes.
 6 Q. What did he say?
 7 A. He's talked in terms -- he's made
 8 complaints himself of being harassed by Harriet.
 9 Q. Okay.
 10 A. That's the nature of our discussion.
 11 Q. That's it?
 12 A. Yeah, yeah. He felt like he was being
 13 harassed.
 14 Q. But then when Harriet was -- said she
 15 felt she was being harassed, you didn't have any
 16 discussions with him about --
 17 A. Yes, I had to -- like I said before, the
 18 claims -- I have to speak to the people she's making
 19 claims against and any witnesses. And I believe
 20 there -- my notes are included in my meeting with
 21 him, so yeah.
 22 Q. Okay.
 23 MR. BAIL: I pass the witness.
 24 MS. GRANT: I have no questions.
 25 *****

Page 28

1 CHANGES AND SIGNATURE
 2 WITNESS NAME: DATE OF DEPOSITION:
 3 TONI HORTON FEBRUARY 6, 2020
 4 PAGE LINE CHANGE REASON
 5 _____
 6 _____
 7 _____
 8 _____
 9 _____
 10 _____
 11 _____
 12 _____
 13 _____
 14 _____
 15 _____
 16 _____
 17 _____
 18 _____
 19 _____
 20 _____
 21 _____
 22 _____
 23 _____
 24 _____
 25 Job No. 18929

7 (Pages 25 to 28)

TONI HORTON - 2/6/2020

Page 29

1 I, TONI HORTON, have read the foregoing
 2 deposition and hereby affix my signature that same
 3 is true and correct, except as noted herein.
 4
 5 _____
 6 TONI HORTON
 7
 8 STATE OF)
 9 COUNTY OF)
 10
 11 BEFORE ME, _____, on this day
 12 personally appeared TONI HORTON, known to me (proved
 13 to me on the oath of _____ or
 14 through _____ (description of
 15 identity card or other document) to be the person
 16 whose name is subscribed to the foregoing instrument
 17 and acknowledged to me same was executed for the
 18 purposes and consideration therein expressed.
 19 Given under my hand and seal of office this _____
 20 day of _____, _____.
 21
 22 _____
 23 NOTARY PUBLIC IN AND FOR
 24 THE STATE OF _____
 25 Job No. 18929

Page 31

1 reasons therefor;
 2 _____ was not requested by the
 3 deponent or a party before the completion of the
 4 deposition.
 5 I further certify that I am neither
 6 attorney nor counsel for, related to, nor employed
 7 by any of the parties to the action in which this
 8 testimony was taken. Further, I am not a relative
 9 or employee of any attorney of record in this cause,
 10 nor am I financially or otherwise interested in the
 11 outcome of the action.
 12 Subscribed and sworn to on this the
 13 10th day of February, 2020.
 14
 15
 16
 17
 18
 19 _____
 20 MICHELLE PROPPS, CSR
 21 Expiration Date 10-31-21
 22 Hanna & Hanna, Inc.
 23 Firm Registration No. 10434
 24 8582 Katy Freeway, Suite 105
 25 Houston, Texas 77024
 713.840.8484
 www.hannareporting.com

Page 30

1 IN THE UNITED STATES DISTRICT COURT
 2 FOR THE SOUTHERN DISTRICT OF TEXAS
 3 HOUSTON DIVISION
 4
 5 HARRIET LANE,)
 6)
 7 Plaintiff,)
 8)
 9 VS.) C.A. NO. 4:19-cv-00435
 10)
 11 SIEMENS ENERGY, INC.,)
 12)
 13 Defendant.)
 14
 15 REPORTER'S CERTIFICATION
 16 ORAL DEPOSITION OF
 17 TONI HORTON
 18 FEBRUARY 6, 2020
 19 I, MICHELLE R. PROPPS, Certified
 20 Shorthand Reporter in and for the State of Texas,
 21 hereby certify to the following:
 22 That the witness, TONI HORTON, was
 23 duly sworn by the officer and that the transcript of
 24 the oral deposition is a true record of the
 25 testimony given by the witness;
 I further certify that pursuant to
 FRCP Rule 30 (f) (1) that the signature of the
 deponent:
 ___X___ was requested by the deponent
 or a party before the completion of the deposition
 and returned within 30 days from date of receipt of
 the transcript. If returned, the attached Changes
 and Signature Page contains any changes and the

8 (Pages 29 to 31)